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October 15, 2003

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Ms. Marlene H. Dortch
Secretary, Federal Communications Commission
445 12th St., S.W., Room TW-A325
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COPY

Re: *In the Matter of:* Nomination for Universal Service
Administrative Company Board of Directors
CC Docket Nos. 97-21 and 96-45

Dear Ms. Dortch

Pursuant to the Commission's Public Notice of September 26, 2003, DA 03-2957, the Rural Independent Competitive Alliance (RICA) nominates Paul Schuetzler for appointment as the member of the Board of Directors of the Universal Service Administrative Company (USAC) representing competitive local exchange carriers (position currently held by David Conn).

Mr. Schuetzler is Chief Executive Officer of Consolidated Telcom, the parent company of Communications Networks, Inc (CCNI), a rural facilities-based competitive local exchange carrier headquartered in Dickinson, North Dakota. Mr. Schuetzler, who has directed CCNI since its inception, is also Chairman of RICA, which, with more than 80 members, is the premiere organization giving voice to the nation's rural CLECs.

RICA believes it very important that the CLEC representative on the USAC Board represent a group of companies that both receive support from, and contribute to, the universal service support mechanisms. A quarter of RICA's membership —some twenty carriers—have obtained ETC status and receive or expect soon to receive high cost universal service support.

Since its inception, the USAC board has been without representation from the estimated 140 rural CLECs providing superior and advanced services nationwide. Rural CLECs operate in low density, high cost areas where the effective and efficient administration of universal service support by USAC is of most concern. As primarily facilities-based carriers, RICA members have brought substantial benefits in the form of improved quality and grade of service, including access to advanced services, which would otherwise be unavailable in their communities. Accomplishment of these Communications Act goals has required capital investment at a level substantially above that required for urban service. Sound management of USAC is thus a central concern of RICA members. Because rural CLECs also contribute to the funds administered by

USAC, it is in their interest as well that USAC's administrative expenses be no higher than necessary to properly fulfill its duties.

Mr. Schuetzler, with more than 23 years in telecommunications, has extensive experience in organization management, accounting, budgeting and finance, and the Commission's rules regarding universal service support. In addition, Mr. Schuetzler has worked closely with multiple schools with respect to the successful implementation of "E-rate" programs administered by the Schools and Libraries Division of USAC.

In short, Mr. Schuetzler is uniquely qualified to make a substantial contribution to the effective oversight of USAC.

Please do not hesitate to contact the undersigned with any questions in regard to this nomination.

Respectfully submitted,



David Cosson

Clifford C. Rohde

Counsel to the Rural Independent Competitive Alliance

Enclosure

cc: Chairman Powell
Commissioner Abernathy
Commissioner Copps
Commissioner Martin
William Maher
Sheryl Todd (2 copies), Telecommunications Access Policy Division (Room 5-B540)

Biography of Paul G. Schuetzler



Paul Schuetzler, Consolidated Telcom's CEO, has served the telecommunications industry for the past 23 years. In his current role, Mr. Schuetzler is responsible for the vision, development and growth of Consolidated Telcom, a telephone cooperative serving southwest North Dakota, as well as its numerous subsidiaries offering competitive telephone service, broadband and cable television services. Working closely with industry organizations, regulatory bodies and congressional members, he provides a respected voice to small, rural communications providers.

Mr. Schuetzler is Chairman of RICA (Rural Independent Competitive Alliance), an organization of more than 80 small, competitive local exchange carriers providing advanced telecommunication services to underserved markets in rural America.

Mr. Schuetzler also serves on numerous local and state organizations and boards as an advocate of rural and competitive providers. He and Consolidated work closely with local schools and libraries to maximize the effectiveness of their Universal Service Administrative Company-administered Schools and Libraries ("E-rate") funding. They have developed the SPICE (southwest pipeline of information for communities and education) consortium of five school districts and Dickinson State University in southwest North Dakota to provide shared, video based instruction to increase the learning opportunities in our rural communities.

Starting his telecommunications career in 1980 with United Telephone (now Sprint), Mr. Schuetzler has also spent time with Citizens Utilities and, in 1997, joined Consolidated Telcom to start up their competitive telecommunications business.

Mr. Schuetzler graduated Boise State University with a degree in accounting, and received his MBA from LaSalle University.

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